

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JENNIFER BRUNNER,)	Case No. 4:23-cv-2180
)	
Plaintiff,)	Judge Pearson
)	
v.)	
)	
FRANK LAROSE, et al.)	
)	
Defendants.)	

MOTION OF PLAINTIFF FOR AN EXTENSION OF TIME

Plaintiff Jennifer Brunner moves this Court for an order pursuant to Fed. R. Civ. P. 6(b)(1) granting her an extension of time in which to file her opposition to Defendants’ motion to dismiss [DE12]. Defendants moved to dismiss the complaint on January 8, 2024, and pursuant to this Court’s prior order, Plaintiff’s opposition is presently due on February 16, 2024. Plaintiff now seeks an extension of three (3) days, such that her opposition papers be due on or before February 19, 2024.

Under Rule 6, a court may extend the time in which an act must be done “for good cause.” Fed. R. Civ. P. 6(b)(1)(A). Plaintiff respectfully requests that good cause for a brief extension exists here. Most principally, unexpected personal and professional obligations have arisen subsequent to this Court’s prior order which have unavoidably delayed completion of the opposition papers. Moreover, this case remains in its infancy, with no currently scheduled hearing or trial dates; As such, a brief extension will not unduly delay resolution of these proceedings. Further, an extension here will promote the resolution of this matter on the merits and in a “just” manner. *See* Fed. R. Civ. P. 1. Finally, there will be no prejudice to Defendant resulting from a brief extension of just three days.

For these reasons, Plaintiff therefore respectfully requests that this Court enter an order pursuant to Fed. R. Civ. P. 6 granting her an extension until on or before February 19, 2024 in which to file her opposition to Defendants' motion to dismiss. For the Court's convenience, a proposed order is submitted herewith.

Respectfully Submitted

/s/ Patrick M. Quinn

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16th day of February, 2024, a true and accurate copy of the foregoing document was filed with the Clerk of Courts' ECF system, which will send notice to all parties and counsel of record.

/s/ Patrick M. Quinn

Patrick M. Quinn (0081692)